

In the United States District Court
For the Middle District of Pennsylvania

James H. Williams
Plaintiff

Civil No# 1:cv-01-280

v/s

Richard L. Spade
Defendant

Judge Kane

FILED
SCRANTON

MAY 24 2004

Per

Plaintiff's First Request
For Production of Documents

Ques

Pursuant to Rule 34 of the Federal Rule of Civil Procedure
And District Court order dated April 26, 2004.

A) All discovery shall be completed within thirty (30) days
of the date of this order.

B) Dispositive motions, if any, shall be filed within thirty
(30) days of the close of discovery.

Plaintiff hereby requests that Defendants produce for
inspection and copying, the documents and tangible things identified
below within thirty (30) CALENDAR days of the service of this
document request.

1) Any and All policies, procedures, regulations, instructions,
Memoranda, Dept of Correction "Code of Ethics" DC-174, INTERNAL COM-
MUNICATION and directives in effect from JANUARY of 1997 through FEBRUARY
1999 from STATE CORRECTIONAL INSTITUTIONAL AT MAHANAY, PA. (S.C.I. Mahanoy)
301 Morea Road, FRACKVILLE, PA. 17932

This include policies and procedures as stated above for
I-block as well, where the incident occurred. I-block has a separate
rule and regulation dealing with level 4 inmates. their population
level 3.

(DC-ADM 801, DC-ADM 802 and DC-ADM 804)

2) Any and all smoking and nonsmoking policies, cell Agreements, documents Plaintiff signed upon ARRIVALE AT S.C.I. Mahanoy JAN 7, 97 relating to being A Smoker or non-smoker STATUS. EACH Cell ASSIGNMENT of Plaintiff while housed on I-block only July 98 thru Feb, 99 AT S.C.I. Mahanoy.

3) Any notes, documents, letters, memoranda, files, records, Record books, logs, grievance reports or written communications concerning complaints made AGAINST MR. Richard L. Spade UNIT MANAGER at S.C.I. Mahanoy, between July 98 thru Feb 8, 99 filed by Plaintiff and/or other inmates housed on I-block with MR. Spade Defendant. This include ANY reprimand report AS WELL WITHIN THE DEPT OF CORRECTION AS WELL outside of Dept of correction.

4) ALSO specifically, Any and All procedures dealing with separation of STAFF and inmates relating to THREATS and ASSAULTS policy.

5) All statements made by MR. Spade Defendant concerning Plaintiff, relating to smoking incident, threats AGAINST Defendant and ASSAULT Feb 8, 99 AND/OR PRIOR to FEBRUARY 8, 1999. Threats.

6) S.C.I. MAHANOY logs or files to determine exact time MAHANOY STAFF RAN exercise YARD on FEBRUARY 8, 99. TIME STARTED AND CEASED YARD movement.

DATE MAY 17, 2004

By: James Williams pro se.

JAMES H. WILLIAMS AY-8692

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WAYNESBURG, PA. 15370